

11/23/04
BDB reviewed
DW

Dwight E. Nunn
Vice President

November 15, 2004

10/14/04
69FR 61049
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Mr. Michael T. Lesar
Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: "Proposed Generic Communication; Establishing and Maintaining a Safety Conscious Work Environment," Request for Comment.
(69 Federal Register 61049; October 14, 2004)

Dear Sir or Madam:

Southern California Edison (SCE) is committed to establishing and maintaining a strong and effective Safety Conscious Work Environment (SCWE) at San Onofre Nuclear Generating Station (SONGS). At SONGS that commitment includes training to the site population on our SCWE expectations, providing an alternate path for the raising of concerns (an Employee Concerns Program), investigating allegations of retaliation or of chilled work environments, taking action, if needed, periodically having its SCWE independently assessed, and other measures.

To help meet these commitments, SCE participates in benchmarking and in the Nuclear Energy Institute's (NEI) sharing of industry practices¹ for establishing and maintaining a SCWE. SCE has adopted many of these practices when they fit our culture and organization and benefit our SCWE. SCE has also found that some of these practices do not fit our organization and culture, has determined that they would not improve the SCWE at SONGS, and does not plan to implement them.

SCE has reviewed the subject Regulatory Information Summary (RIS) and in SCE's opinion the fact that the NRC would publish a RIS on this subject provides the document with the imprimatur of the regulator, which invites the Commission's staff and the public to treat the RIS as a check-list and creates the expectation that every licensee must adopt

¹ NE1 97-05, "Nuclear Power Plant Personnel-Employee Concerns Program-Process Tools in a Safety-Conscious Work Environment," Revisions 0, 1 and 2.

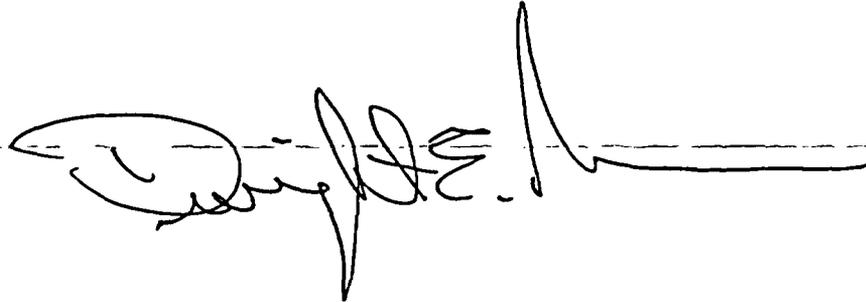
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SIS Review Complete

every element listed. To the contrary, and like the shared industry practices referenced previously, not every element in the RIS is beneficial to or needed by every licensee or by every licensees' SCWE.

In summary, Southern California Edison agrees with the Nuclear Energy Institute that such a RIS ought not to be issued. SCE participated in developing and also concurs with the more detailed comments submitted by the Nuclear Energy Institute.²

A handwritten signature in black ink, appearing to read "Charles M. Dugger", is written across a horizontal dashed line.

² Letter Charles M. Dugger, Nuclear Energy Institute, to Mr. Michael T. Lesar, Chief, Rules and Directives Branch, U.S. Nuclear Regulatory Commission, Subject: Re: Proposed Generic Communication; Establishing and Maintaining a Safety Conscious Work Environment (69 Fed Reg. 61049; October 14, 2004), Dated November 15, 2004